

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TRIBUNE COMPANY FRAUDULENT
CONVEYANCE LITIGATION

Consolidated Multidistrict Action
11 MD 2296 (WHP)

ECF Case

THIS DOCUMENT RELATES TO:
ALL MATTERS

**DECLARATION OF JAMES S. GREEN, JR., IN SUPPORT OF PLAINTIFFS' THIRD
OMNIBUS MOTION TO ENLARGE THE TIME FOR SERVICE OF SUMMONSES AND
COMPLAINTS**

I, James S. Green, Jr., pursuant to 28 U.S.C. § 1746, declare under penalty of perjury that:

1. I am an attorney at Landis Rath & Cobb LLP ("LRC"), co-counsel for the Tribune Litigation Trust in the Committee Action, and submit this declaration in support of Plaintiffs' Third Omnibus Motion to Enlarge the Time for Service of Summonses and Complaints (the "Motion").¹

2. Except where otherwise stated, I make this declaration on the basis of my own personal knowledge, my review of the pleadings, filings, and other relevant documents available to LRC as co-counsel for the Trustee Plaintiff and his predecessor, the Committee Plaintiff, information provided to me by colleagues at LRC, and information provided to me by attorneys

¹ All capitalized terms not defined herein have the meaning ascribed to them in the Motion.

at Zuckerman Spaeder LLP as counsel for the Committee Plaintiff. I am fully familiar with the facts set forth herein.

3. Since commencing the Committee Action, the Trustee Plaintiff, including his predecessor the Committee Plaintiff, have made continuous and diligent efforts to identify, locate, and serve the approximately 30,000 defendants that were originally named in the Committee Action.

4. As of today's date—and despite diligent and, in most cases, repeated efforts—the Trustee Plaintiff has been unable to serve approximately 265 of these defendants that were originally named in the Committee Action.

5. On November 7, 2012, the Committee Plaintiff filed an amended complaint (the “Recently Amended Committee Complaint”) in the Committee Action. The Recently Amended Committee Complaint reflects: (i) pursuant to paragraph 29 of Master Case Order No. 3, the Committee Plaintiff's voluntary dismissal as named defendants, without prejudice, of all defendants that, based upon information currently in the possession, custody, or control of the Committee Plaintiff, received less than \$50,000 in Shareholder Transfers; (ii) the Committee Plaintiff's voluntary dismissal of certain other defendants; and (iii) the addition of almost 1,900 newly discovered defendants that received greater than \$50,000 in Shareholder Transfers.

6. As of today's date—and despite diligent and, in most cases, repeated efforts—the Trustee Plaintiff has been unable to serve approximately 135 defendants that were added in the Recently Amended Committee Complaint.

7. Although the Trustee Plaintiff has now served the vast majority of the named defendants in the Committee Action, efforts to locate and serve the approximately 400 remaining defendants (the “Unserved Committee Defendants”) is ongoing, and additional time is required.

Specifically, additional research—and discovery, if necessary—must still be performed, including identifying: (i) addresses for any Unserved Committee Defendants whose contact information was not provided; and (ii) different addresses for any Unserved Committee Defendants upon whom service was attempted, but for whom summonses were returned as undeliverable.

8. In November and December 2010, the Committee Plaintiff sponsored a nationwide print media campaign, supported by an Internet website with additional information, to notify potential defendants of the pendency of the Committee Action.

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 11, 2013
Wilmington, Delaware

/s/ James S. Green, Jr.

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